

**CHAITMAN LLP**  
Helen Davis Chaitman  
[hchaitman@chaitmanllp.com](mailto:hchaitman@chaitmanllp.com)  
465 Park Avenue  
New York, New York 10022  
Phone & Fax: 888-759-1114

**Presentment Date: January 2, 2020 12:00 PM**  
**Objection Date: December 26, 2019**

*Attorneys for Defendant Edyne Gordon*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

EDYNE GORDON, in her capacity as the executrix  
and beneficiary of the Estate of Allen Gordon,

Defendant.

Adv. Pro. No. 10-04914 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT  
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.  
§1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendant, Edyne Gordon, in her capacity as the executrix and beneficiary of the Estate of Allen Gordon, (the “Defendant”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the original Defendant Allen Gordon on December 2, 2010 (the “Adversary Proceeding”).

3. Thereafter, Allen Gordon retained Becker & Poliakoff LLP to represent him.

4. On behalf of Allen Gordon, while at Becker & Poliakoff, LLP, I filed a Notice of Appearance on February 2, 2011 (ECF Doc. No. 3).

5. On December 30, 2013 the Court signed a So Ordered Stipulation for Substitution of Defendant of Edyne Gordon, in her capacity as executrix and beneficiary of Allen Gordon, deceased, as Defendant (ECF Doc. No. 26).

6. On behalf of the Defendant as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 5, 2015 (ECF Doc. No. 44).

7. Despite numerous attempts over the past several months to communicate with Defendant, to date she has not responded.

8. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as Defendants’ counsel.

9. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendant.

Dated: December 11, 2019  
New York, New York

/s/ Helen Davis Chaitman

